THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ARRIVALSTAR S.A. and MELVINO TECHNOLOGIES LIMITED,
 	
     Plaintiffs,
 	
          v.
 	
HAPAG-LLOYD USA, LLC,
 	
     Defendant.
	Cause No. C11-00912 RSM
	
	MOTION FOR VOLUNTARY DISMISSAL WITH PREJUDICE
	
	NOTE ON MOTION CALENDAR:
	March 2, 2012

MOTION FOR VOLUNTARY DISMISSAL

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the terms of a separate Settlement, Release, and License Agreement, Plaintiffs ArrivalStar S.A. and Melvino Technologies Limited ("PLAINTIFFS"). and Defendant Hapag-Lloyd USA, LLC ("HAPAG-LLOYD") have agreed to settle, adjust, and compromise all claims and counterclaims against each other in the above-captioned action. The parties, therefore, move this Court to dismiss all claims by PLAINTIFFS against HAPAG-LLOYD with prejudice and any compulsory

VOLUNTARY DISMISSAL (HAPAG-LLOYD) - 1
(C11-912RSM)

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counterclaims made, or that could have been made, by HAPAG-LLOYD against

PLAINTIFFS with prejudice .

PLAINTIFFS and HAPAG-LLOYD further move the Court to order that all costs and

expenses relating to this litigation (including attorney and expert fees and expenses) shall be

borne solely by the party incurring same.

A proposed order accompanies this motion.

Dated this 2nd day of March, 2012.

AGREED:

/Philip P. Mann_____   /John A. Knox_____
Philip P. Mann   John A. Knox
MANN LAW GROUP   **WILLIAMS, KASTNER & GIBBS PLLC**
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Seattle, WA 8101   Seattle, WA 98101-2380

COUNSEL FOR ARRIVALSTAR S.A   COUNSEL FOR HAPAG-LLOYD USA,
AND MELVINO TECHNOLOGIES,   LLC.
LIMITED.

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CERTIFICATE OF SERVICE

2   I hereby certify that on the day indicated below, I electronically filed the foregoing

3 with the Clerk of the Court using the CM/ECF system which will send notification of such

4 filing to all parties that have appeared in this matter.

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6   Dated March 2, 2012.

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                                              /s/ Anne K. Smart
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